

**Exhibit A - Proposed Claim Constructions & Supporting Evidence**

	<b>Term to be Construed</b>	<b>Defendants' Proposed Construction</b>	<b>Defendants' Supporting Evidence</b>	<b>Morpho Komodo's Proposed Construction</b>	<b>Morpho Komodo's Supporting Evidence</b>
1.	<b>computer</b>	"a laptop or desktop computer"	'078 patent at 2:31-48; FIGS. 1, 6 <sup>1</sup> (and corresponding portions of '725 and '415 Patents).  '415 patent at claims 1-4.  File History: MK-BLU_0000000711-720.	"a device having a processor, a memory, one or more devices with retention medium(s), and having the capacity to receive input from one or more input devices"	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 2:31-48 (and corresponding portions of '725 and '415 Patents).
2.	<b>input device</b>	"a device by which a user enters explicit input into a computer"	078 Patent at Abstract; 1:21-40; 2:30-44; 3:16-28; FIG. 1 (and corresponding portions of '725 and '415 Patents).  File History: MK-BLU_0000000194-207; 396 – 398; 442; 453-467; 509-517.	"a device by which a user enters input into a computer system"	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 2:30-48; 3:15-25 (and corresponding portions of '725 and '415 Patents).
3.	<b>user-selected device / user-selected input device</b>	"an input device selected by the user" [in view of the construction of "input device"]	078 Patent at Abstract; 1:21-40; 2:30-44; 3:16-28; FIG. 1 (and corresponding portions of '725 and '415 Patents).  File History: MK-BLU_0000000194-207;	"device selected by the user and by which the user enters input into a computer system"	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 2:30-48; 3:15-28 (and corresponding portions of '725 and '415 Patents).

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<sup>1</sup> Any citation to a figure inherently includes descriptive text in the specification regarding that figure.

			396 – 398; 442; 453-467; 509-517.		
4.	<b>measurable variable input</b>	“an input quantity that can gradually vary and that must be measured, as opposed to an input that is discretely identifiable”	’078 Patent at 1:21-29; 5:4- 19; FIGS. 9-10 (and corresponding portions of ’725 and ’415 Patents).	“an input quantity that can vary and that must be measured, as opposed to an input that is distinctly identifiable”	<b><u>Intrinsic Evidence:</u></b> : 078 Patent, 1:21-28; 3:5-6; 3:16-37; 4:19-20 (and corresponding portions of ’725 and ’415 Patents)..
5.	<b>signal</b>	“a set of related software-recognizable data from a single transmission from an input device”	’078 Patent at 1:46-47; 2:10-11; 2:57-64; 3:29-47; 3:51-56; 4:4-14; 4:34-43; 5:57-5:3; 5:4-19; 5:28-29; 7:59-64; 7:66-67; FIGS. 5, 9-10 (and corresponding portions of ’725 and ’415 Patents).  ’078 Patent at claims 1 and 4.  ’725 Patent at claims 1, 2, 9, 10, 11, 15.	“a set of related software-recognizable data which results from user input into the computer via an input device”	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 3:16-19; 3:29-30 (and corresponding portions of ’725 and ’415 Patents).
6.	<b>signature</b>	“a transmission intended as a security precaution to preclude unauthorized access to a computer”	’078 Patent at 2:56-3:15; 3:65-4:3; FIGS. 1, 2; 3, 4 (and corresponding portions of ’725 and ’415 Patents).	“at least one transmission intended as a security precaution to preclude unauthorized access”	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 2:56-63; 3:1-15; 3:65-4:5 (and corresponding portions of ’725 and ’415 Patents).
7.	<b>wherein creating said signature using recorded signals from a plurality of signal types</b>	indefinite	725 Patent: Claims 15-20	Plain and ordinary meaning.  Or in the alternative:	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 3:30-43; 5:1-19; 4:63-64; 5:4-19 (and corresponding portions

				“wherein creating said [at least one transmission intended as a security precaution to preclude unauthorized access] using recorded [sets of related software-recognizable data which results from user input into the computer via an input device] from a plurality of [categories of measurable variable input associated with a signal from at least one user-selectable input device]”	of '725 and '415 Patents).
8.	<b>wherein passively terminating said recording</b>	indefinite	725 Patent, claims 10-14.	Plain and ordinary meaning.  Or in the alternative:  “wherein [stopping] said recording [without overt user action when a predetermined condition is met]”	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 1:44-48; 4:40-46; 447-56 (and corresponding portions of '725 and '415 Patents).
9.	<b>wherein recording a plurality of signal</b>	indefinite	725 Patent, claim 15.	Plain and ordinary meaning.	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 3:30-43; 5:1-19; 4:63-64; 5:4-19 (and

	types for at least one user-selected device			Or in the alternative: “wherein recording a plurality of [categories of measurable variable input associated with a signal from at least one user-selectable input device] for at least one [device selected by the user and by which the user enters input into a computer system]”	corresponding portions of '725 and '415 Patents).
10.	wherein said recording comprises a plurality of user-selected devices	indefinite	078 Patent, claims 1-2, 9-10.	Plain and ordinary meaning.  Or in the alternative:  “wherein said recording comprises a plurality of [devices selected by the user and by which the user enters input into a computer system]”	<b><u>Intrinsic Evidence:</u></b> 078 Patent, 1:44-48; 3:30-43; 4:47-56; 4:63-64; 5:1-19; 5:4-19 (and corresponding portions of '725 and '415 Patents).